

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ALVIN GREENBERG, MICHAEL STEINBERG, JULIE HANSON, CHRISTINA KING, and RONNELL ROBERTSON, on behalf of themselves and all others similarly situated,

Case No. 2:21-cv-00898-RSL

**STIPULATED MOTION FOR
LEAVE TO FILE SECOND
AMENDED COMPLAINT**

Plaintiffs,

V.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

**STIPULATED MOTION FOR LEAVE TO
FILE SECOND AMENDED COMPLAINT**

HAGENS BERMAN

1 Pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure and Local Civil Rule 15,
2 the parties and their respective counsel stipulate as follows:

3 1. Rule 15(a)(2) of the Federal Rules of Civil Procedure permits Plaintiffs to amend
4 their complaint with the consent of the Defendant. The parties have met and conferred, and
5 Defendant has consented to Plaintiffs filing their Second Amended Complaint (“SAC”), without
6 prejudice to Defendant’s rights and defenses, including filing a motion challenging the SAC under
7 Rule 12.

8 2. Pursuant to Local Rule 15, a clean copy of the SAC is attached as Exhibit A and a
9 redline copy of the SAC is attached as Exhibit B.

10 3. Pursuant to their prior Joint Status Report (Dkt. 52), by September 27, 2024, the
11 Parties will submit a supplemental Joint Status Report with proposed modifications to the case
12 schedule, including a proposed deadline for Amazon’s response to the SAC.

13 THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the
14 Parties, through their undersigned counsel of record, and the Parties ask the Court to order that:

15 1. Plaintiffs file their SAC, substantially in the form of Exhibit A, no later than seven
16 (7) days from the date the Order is entered.

17 2. No later than September 27, 2024, the Parties shall submit proposed modifications
18 to the case schedule.

19 DATED: September 19, 2024

Respectfully submitted,

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10 *Attorneys for Plaintiffs and the Proposed Class*

11 DATED: September 19, 2024

12 Respectfully submitted,

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22 *Attorneys for Defendant Amazon.com, Inc.*

ORDER

The Court GRANTS the Parties' stipulated motion. Within seven (7) days of this Order, Plaintiffs may file their Second Amended Complaint (substantively in the form of Exhibit A). No later than September 27, 2024, the Parties shall submit proposed modifications to the case schedule.

Dated this 20th day of September, 2024.

Robert S. Lasnik
Robert S. Lasnik
United States District Judge